

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	No.
	)	
	)	Violations: Title 18, United States
v.	)	Code, Sections 373(a), 1512(a)(1)(A)
	)	and 1958(a)
	)	
ADEL DAOUD	)	<u>INDICTMENT</u>

**COUNT ONE**

The SPECIAL SEPTEMBER 2012 GRAND JURY charges:

1. At times material to this indictment:
  - a. Individual A was a Special Agent of the Federal Bureau of Investigation.
  - b. The FBI was a part of the United States Department of Justice, which, in turn, was a department within the Executive Branch of the United States Government.
  - c. In or around July 2012, defendant ADEL DAOUD was introduced to Individual A, who was working in an undercover capacity and posing as a terrorist residing in New York.
  - d. Between on or about July 17, 2012, and on or about September 14, 2012, defendant ADEL DAOUD selected, researched, and surveilled a target for a terrorist attack to be conducted in Chicago, Illinois, with an explosive device to be supplied by Individual A.

e. On or about September 14, 2012, defendant ADEL DAOUD attempted to detonate a purported explosive device outside of a bar in downtown Chicago. After doing so, defendant DAOUD was arrested by FBI agents and charged with terrorism-related offenses in *United States v. Adel Daoud*, 12 CR 723, in the United States District Court for the Northern District of Illinois.

f. Following his arrest, defendant ADEL DAOUD learned that Individual A was an agent of the FBI.

2. Beginning no later than on or about October 26, 2012, and continuing until on or about November 29, 2012, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADEL DAOUD,

defendant herein, with intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, and threatened use of physical force against the person of another, namely, Individual A, in violation of the laws of the United States, namely, Title 18, United States Code, Section 1114, and under circumstances strongly corroborative of that intent, solicited, commanded, induced, and otherwise endeavored to persuade such other person to engage in such conduct;

In violation of Title 18, United States Code, Section 373(a).

**COUNT TWO**

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. On or about November 28, 2012, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADEL DAOUD,

defendant herein, knowingly used and caused another to use a facility of interstate commerce, namely, a cellular telephone utilizing an interstate cellular telephone service provider, with the intent that a murder be committed in violation of the laws of the United States, namely, the murder of Individual A, in violation of Title 18, United States Code, Section 1114, as consideration for a promise and agreement to pay something of pecuniary value;

In violation of Title 18, United States Code, Section 1958(a).

**COUNT THREE**

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. Beginning no later than on or about October 26, 2012, and continuing until on or about November 29, 2012, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADEL DAOUD,

defendant herein, knowingly attempted to kill another person, namely, Individual A, with the intent to prevent the attendance and testimony of that person in an official proceeding;

In violation of Title 18, United States Code, Section 1512(a)(1)(A).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY